

EXHIBIT 4

AFFIDAVIT OF ERIC LEE

I swear under penalty of perjury that the following is true and correct:

1. My name is Eric Lee, I am an attorney and I represent Momodou Taal, Sriram Parasurama, and Mukoma Wa Ngũgĩ in Case 3:25-cv-00335-ECC. I am a member of the Bar of the State of Michigan and my bar number is P80058. My office is located at 24225 W 9 Mile Rd Ste 140. Southfield, MI 48033-3962. I have been admitted in the above-captioned matter *pro hac vice*.
2. This morning, I received the attached email timestamped 12:52 AM, March 21. The subject line is “Momodou Taal et al v. Trump, 25-cv-335 (NDNY)” and the sender is Ethan Kanter of the Department of Justice’s Operation of Immigration Litigation.

Signed,

/s/Eric Lee

Date: March 21, 2025